



Federal Communications Commission
Washington, D.C. 20554

October 21, 2019

DA 19-1054

Robert A. Dukish
3835 Fairway Dr.
Canfield, OH 44406

Re: Petition for rulemaking, RM-11826

Dear Mr. Dukish:

This letter responds to the petition for rulemaking that you filed on December 26, 2018, regarding amateur radio service station identification.¹ Specifically, you propose to allow a single point of transmission for station identification during emergency communications and drills. For the reasons set forth below, we deny the petition.

Section 97.119(a) of the Commission's rules provides that an amateur station must transmit its call sign at the end of each communication and at least every 10 minutes during a communication.² You state that emergency communications sometimes exceed 10 minutes, and that requiring station identification in that interval is burdensome and hinders the flow of emergency traffic.³ You propose that the rule be amended to provide that during a local emergency network activation or drill, the net control operator or some other designated station may transmit the call sign of each participating station every 10 minutes in lieu of each participating station transmitting its call sign.⁴

Commenters overwhelmingly oppose the proposal.⁵ They argue that the current rule strikes the appropriate balance between the need to identify the source of transmissions and ease of communication.⁶ Commenters state that, in their years of experience with amateur emergency communications, the station identification requirement has not proven to be a burden or obstacle,⁷ and that the current procedure actually contributes to efficient operations by providing a clear indication that a communication has ended and the channel is available.⁸ They also assert that your proposed procedure is unworkable and would

¹ Robert A. Dukish, Petition for Rule Making, RM-11826 (Dec. 26, 2018) (Petition).

² 47 CFR § 97.119(a).

³ See Petition at 3.

⁴ See *id.* at 3-4.

⁵ The petition went on public notice on February 8, 2019. See *Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemakings Filed*, Public Notice, Rep. No. 3114 (CGB Feb. 8, 2019). Approximately 60 comments were received.

⁶ See, e.g., Ed Woodrick Comments at 1 (Feb. 14, 2019).

⁷ See, e.g., Marlo Montanaro Comments at 1 (Feb. 11, 2019).

⁸ See, e.g., Martin A. Woll Comments at 1 (Mar. 4, 2019).

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cause confusion.⁹ Multiple commenters characterized the proposal as “a solution in search of a problem.”¹⁰

The purpose of the station identification requirement is to make the source of transmissions clearly known to those receiving those transmissions.¹¹ Separating the call sign from each transmission would defeat this purpose. Moreover, you have not presented, and the record does not contain, any evidence that compliance with the station identification rule has hindered amateur emergency communications. Consequently, we are not persuaded that the requested rule change is necessary or supported by the amateur radio community.¹² We therefore deny your petition.

Accordingly, IT IS ORDERED, pursuant to sections 4(i) and (j) and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), (j), 303(r), and section 1.407 of the Commission's rules, 47 CFR § 1.407, that the petition for rulemaking filed by Robert A. Dukish on December 26, 2018, IS DENIED.

This action is taken under delegated authority pursuant to sections 0.131 and 0.331 of the Commission's rules, 47 CFR §§ 0.131, 0.331.

FEDERAL COMMUNICATIONS COMMISSION

Scot Stone
Deputy Chief, Mobility Division
Wireless Telecommunications Bureau

⁹ See, e.g., Michael Hoeft Comments (Feb. 13, 2019).

¹⁰ See, e.g., Thomas Currie Comments at 2 (Feb. 14, 2019).

¹¹ 47 CFR § 97.119(a); *Changes in Part 97 with Regard to Amateur Radio Service Rules, 97.119(a) Station Identification; Proposed Changes in 47 CFR Part 97 Section 97.119; Amendment of Part 97 of the Commission's Rules Governing the Amateur Radio Service to Provide for Recognition of Amateur Operators Who Have Served in the United States Military*, Order, 22 FCC Rcd 12730, 12731, para. 4 (WTB MD 2007) (*Amateur Station Identification Order*) (citing *Amendment of the Amateur Service Rules to Provide for Greater Use of Spread Spectrum Communication Technologies*, Report and Order, 15 FCC Rcd 1481, 1488, para. 6 (1999)).

¹² See Glen E. Zook, Letter Order, 27 FCC Rcd 5317, 5317-18 (WTB MD 2012) (dismissing petition proposing an exception to the amateur station identification rule); *Amateur Station Identification Order*, 22 FCC Rcd at 12731-32, paras. 4-5 (dismissing petitions proposing changes to amateur station identification rule because the record reflected that commenters supported the existing rule).